

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

AARON GOINS et al., )  
Plaintiffs/Counter Defendants, )  
v. )  
TITLEMAX OF VIRGINIA, et al., )  
Defendants/Counter Claimants. )  
)

**DARLENE WATSON RESONSE TO TITLEMAX'S MOTION TO CONFIRM  
AWARD**

While Watson disagrees with the Arbitrator’s Award, she does not move this Court to set it aside. Doing so would not be in good faith given so many reasonable Arbitrators disagree here. TitleMax continues to choose that tactic every time it loses. Rather than simply consent to a dismissal or offer a consent order, TitleMax takes this Court’s time unnecessarily once again. Claimant has no objection to the proposed Order other than to note that the Court should dismiss the counterclaims that are pending against Ms. Watson as well. TitleMax did not pursue those in the Arbitration. Claimant only files this response so that the Court need not take the time to wonder why a response was not filed.

This is the 27<sup>th</sup> day of March, 2023

/s/ Andrew H. Brown  
Andrew H. Brown  
N.C. State Bar No. 28450  
Attorney for Plaintiffs

**FOR THE FIRM:**

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**CERTIFICATE OF WORD COUNT**

I hereby certify that the foregoing document complies with the word count limits contained in LR 7.3(d)(1).

*/s/ Andrew H. Brown*  
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